

REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-4 are pending in the application, and are amended by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.¹ No new matter is presented.

In the Office Action, Claims 1-4 are rejected under 35 U.S.C. § 112, second paragraph; and Claims 1-4 are rejected under 35 U.S.C. § 102(e) as anticipated by Neves (U.S. Pub. 2006/0276209).

The undersigned appreciatively acknowledges the courtesy extended by Examiner Adhami and Supervisory Patent Examiner (SPE) Backer in holding a personal interview with the undersigned on December 1, 2008. During the interview, an overview of the invention was presented, and proposed claim amendments were discussed that Examiner Adhami indicated would overcome Neves. Accordingly, the proposed amendments discussed during the interview are incorporated into independent Claims 1-4, as discussed below.

The Office Action rejects Claims 1-4 under 35 U.S.C. § 112, second paragraph, as indefinite. In response to this rejection, Claims 1-4 are amended to correct the informalities noted in the Office Action.

Accordingly, Applicants respectfully request that the rejection of Claims 1-4 under 35 U.S.C. § 112, second paragraph, be withdrawn.

The Office Action rejected Claims 1-4 under 35 U.S.C. § 102(e) as anticipated by Neves. In response to this rejection, Applicants respectfully submit that amended independent Claims 1-4 recite novel features clearly not taught by the applied reference.

¹ E.g., specification, Fig. 1 and pp. 7-10.

Amended independent Claim 1, for example, recites, in part, a communication control system comprising:

a source router connected to a source mobile station, and configured to receive data addressed to a destination mobile station transmitted from the source mobile station;

a destination router connected to the destination mobile station, and configured to receive the data transmitted from the source router and send the data to the destination mobile station;

a specific router connected to the source router and the destination router and configured to forward packets received from the source router to the destination router...

Claim 1, further recites that a router controller (e.g., 30 in Fig. 1) determines the specific router (10F in Fig. 1) based on topology information of a plurality of routers controlled by the routing controller and a routing path of the data addressed to the destination mobile station (e.g., mobile station 2), when a trigger receiver receives the predetermined trigger. An address conversion information processing requester of the routing controller requests the source router to create second address conversion information (e.g., stored in cache 12a of router 10A) for converting a destination address of the data from address information of the destination mobile station (#X1) to the address information routed to the specific router (#Y1). The address conversion information processing requester of the routing controller also requests the specific router to create first address conversion information (e.g., stored in cache 12a of router 10F) for converting the destination address of the data from the address information routed to the specific router (#Y1) to the address information of the destination mobile station (#X1).

Independent Claims 2-4, while directed to alternative embodiments, are amended to recite similar features. Accordingly, the remarks and arguments presented below are applicable to each of independent Claims 1-4.

Thus, as disclosed in an exemplary embodiment at Fig. 1, Claims 1-4 are amended to clarify that the specific router is a router that is used to forward packets between the source

router and the destination router. Accordingly, the Foreign Address Masquerader (FAM) of Neves could not reasonably be considered as analogous to the claimed “specific router” as recited in amended independent Claims 1-4.

Neves describes a location-independent packet routing system in a short-range wireless networking environment. Neves’ system includes a Home Agent Masquerader (HAM) and a FAM, and the location of the HAM may be moved to be close to a physical location of a client. More particularly, Neves describes that a roaming coordinator 320 requests the HAM (e.g., source router) to create a HAM conversion record for converting destination address information of the received response data from the masquerade IP address to the address of the FAM (e.g., address of the destination router).² The roaming coordinator then requests the FAM (e.g., destination router) to create a FAM conversion record for converting destination address information of the received response data from the FAM address to the client address of the destination mobile station.³

Thus, Neves describes that the roaming coordinator 320 requests the source router HAM connected by a server and the destination router FAM connected by a client to create the address information for converting/reconverting the address of the client and the address of the destination router HAM for an adequate routing of data addressed to the client from the server, even when the client is roaming.

Neves, however, is not directed to changing a routing path (i.e. *selecting a specific router*) of data addressed to the destination mobile station in accordance with a predetermined trigger such as an occurrence of network congestion and/or a detection of data requiring accounting. Therefore, Neves fails to teach or suggest the claimed features directed to the operations that implicate the *specific router*, as recited in independent Claims 1-4.

² Neves, S735 in Fig. 7 and paragraph [0066]; S1060, S1065 in Fig. 10 and paragraph [0082].

³ Id., S760 in Fig. 7 and paragraph [0067]; S1220, S1250 in Fig. 12 and paragraph [0089].

More particularly, Neves fails to teach or suggest “a router controller configured to *determine the specific router* based on topology information of a plurality of routers controlled by the routing controller *and a routing path of the data addressed to the destination mobile station, when the trigger receiver receives the predetermined trigger,*” as recited in independent Claims 1-4. Further, Neves also fails to teach or suggest a routing controller that *requests the source router* connected by the source mobile station and the determined specific router “*to create second address conversion information for converting a destination address of the data from address information of the destination mobile station to the address information routed to the specific router,*” which is also a feature recited in independent Claims 1-4.

Accordingly, Applicants respectfully request that the rejection of Claims 1-4 under 35 U.S.C. § 103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-4 is definite and patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early a favorable reconsideration of the application is therefore requested.

Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, P.C.

Bradley D. Lytle
Attorney of Record
Registration No. 40,073

Customer Number
22850

Tel: (703) 413-3000
Fax: (703) 413 -2220
(OSMMN 08/07)

Andrew T. Harry
Registration No. 56,959